

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

NATHANIEL JONES,

Plaintiff

**NOTICE OF MOTION
TO DISMISS COMPLAINT**

-against-

Hon. Robert W. Sweet (RWS)

Docket No. 05 CV 3461

National Communication and Surveillance Networks; NY, NJ, Del, Md, DC, VA, NC, SC, GA; John Doe and Jane Doe; New York Police Dept.; NYC Sheriff's Dept.; Fire Dept. New York; City of New York; City of Mt. Vernon NY, Mt. Vernon Police Dept., Mt. Vernon Fire Dept.; Mt. Vernon Bd of Ed, Willie MrCray; Al Goodjoin, M.H. Dudley, Thomas Monroe Turner; Kirk Sookdeco; Larry Barnes; Met Food, Western Beef, Shoprite, Bell Telephone a.k.a Verizon; Fox Five News, Time Warner/HBO, Gerard Joseph; Raphael Joseph; Carter Brothers, Henry Solly, Patricia Solly; King Teleservices; Ocwen Bank, NationBanc; DHHS, CDC; Federal Contractors; US Postal Service; Rossicki, Rossicki & Assoc., Bruce Johnson, Golden Wexler and Sarnesis;

Defendants.

X

PLEASE TAKE NOTICE that upon the annexed Affirmation of Hina Sherwani, Memorandum of Law in Support of the Motion by Defendants City of Mount Vernon, Mount Vernon Police Department and Mount Vernon Fire Department and the attachments thereto, the Defendants will move this Court at a term thereof to be held before the Honorable Robert W. Sweet, at the United States Courthouse 500 Pearl Street,

New York, NY 10007 on Wednesday June 29, 2005 at 12:00 noon, on submission of the papers annexed hereto with no appearance required, for an Order, dismissing plaintiff's complaint, in its entirety, with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, on the grounds that the Complaint fails to state a claim upon which relief can be granted. In the alternative, defendants seek an Order striking plaintiff's complaint based on Rule 8 of the Federal Rules of Civil Procedure.

Dated: Mount Vernon, New York
June 9, 2005

HELEN M. BLACKWOOD, ESQ.
CORPORATION COUNSEL

By: 

HINA SHERWANI, Esq. (HS8283)

Attorneys for Defendants
City of Mount Vernon
1 Roosevelt Square
Mount Vernon, New York 10550
(914) 665-2366

TO: Nathaniel Jones, Esq.
Plaintiff, Pro Se
244 Fifth Avenue, PMB Suite 2340
New York, New York 10001

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Plaintiff

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National Communication and Surveillance Networks;
NY, NJ, Del, Md, DC, VA, NC, SC, GA; John Doe and
Jane Doe; New York Police Dept.; NYC Sheriff's Dept.;
Fire Dept. New York; City of New York; City of Mount
Vernon NY, Mt. Vernon Police Dept.; Mt. Vernon
Board of Ed, Willie MrCray; Al Goodjoin, M. H. Dudley,
Thomas Monroe Turner; Kirk Sookdeeo; Larry Barnes;
Met Food, Western Beef, Shoprite, Bell Telephone a.k.a
Verizon; Fox Five News, Time Warner/HBO, Gerard
Joseph; Raphael Joseph; Carter Brothers, Henry Solly,
Patricia Solly; King Teleservices; Ocwen Bank,
NationBanc; DHHS, CDC; Federal Contractors;
US Postal Service; Rossicki, Rossicki & Assoc.,
Bruce Johnson, Golden Wexler and Sarnesis,

Defendant(s)

NOTICE OF MOTION

Helen M. Blackwood, Esq.
Corporation Counsel
Attorney for Defendant
City of Mount Vernon
Office and Post Office Address
One Roosevelt Square, City Hall
Mount Vernon, NY 10550
Tel. (914) 665-2366

Service of a copy of the within
Dated,

hereby admitted.

Attorney(s) for

PLEASE TAKE NOTICE

☐ that the within is a (certified) true copy of an Order dated 2005

NOTICE OF entered in the office of the clerk of the within named court on 2005
ENTRY

☐ that an Order of which the within is a true copy will be presented for settlement to the Hon.
NOTICE OF one of the judges of the within named Court,

SETTLEMENT at
on

2003,

at

M.

Dated:
Office of the

Attorney for Corporation Counsel
Defendant City of Mount Vernon
City Hall Mount Vernon, NY 10550

To: